

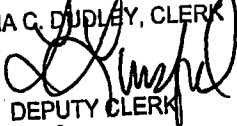
FILED

## UNITED STATES DISTRICT COURT

JUN 11 2019

for the

Western District of Virginia

JULIA C. DUDLEY, CLERK  
BY:   
DEPUTY CLERK

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)  
169 Upper Poor Valley Road  
Saltville, VA

Case No. 1:19mj00076

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that there is now concealed on the following person or property located in the Western District of Virginia (identify the person or describe property to be searched and give its location): 169 Upper Poor Valley Road, Saltville, VA - to include the residence, curtilage, garages, outbuildings, campers, person of Wendi Cross, and vehicles present. Attachment A consists of a photograph of the residence.

The person or property to be searched, described above, is believed to conceal (identify the person or describe the property to be seized): See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of 21 U.S.C. § 846/841(a)(1), and the application is based on these facts: See Attachment C and/or 841(a)(1)

☒ Continued on the attached sheet.

☐ Delayed notice of      days (give exact ending date if more than 30 days:                     ) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Brian Snedeker, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 6/11/19

City and state: Abingdon, Virginia



Judge's signature

Pamela Meade Sargent, USMJ

Printed name and title

## ATTACHMENT A



169 Upper Poor Valley Road, Saltville, VA

ATTACHMENT B

1. Methamphetamine distribution paraphernalia including (but not limited to) scales, cutting material, plastic baggies, wrapping material; devices used to communicate with other drug traffickers/co-conspirators including cellular telephones and two-way radios; electronic equipment used for counter-surveillance to include video surveillance systems and related DVRs (digital video recorders), scanners, and anti-bugging devices.
2. Firearms, including but not limited to handguns, rifles, and shotguns that are commonly used by individuals to protect controlled substances and related drug proceeds/assets. Firearms, oftentimes stolen, are also routinely bartered in exchange for controlled substances.
3. Books, records, ledgers, notes, and videos pertaining to the illicit distribution, purchasing, and transporting of methamphetamine.
4. Messages, letters, telephone numbers, and addresses relating to customers, suppliers, and other co-conspirators involved with the illicit distribution, purchasing, and transporting of methamphetamine. These messages, letters, telephone numbers, and addresses may be written on personal calendars, personal address and /or telephone books, Rolodex type indices, notebooks, loose pieces of paper, and found in mail.
5. Photographs and videos depicting methamphetamine, drug distribution paraphernalia, substantial assets, co-conspirators, and persons with methamphetamine,
6. Books, ledgers, receipts, bank statements, cashier's checks, and other items evidencing the acquisition, secreting, transferring and/or concealment of assets or the expenditure of narcotics proceeds.
7. Items or articles of personal property tending to show ownership, dominion, or control of the premises/property/vehicles. Such items or articles include (but are not limited to) personal identification, personal correspondence, diaries, checkbooks, notes, photographs, keys, receipts, mail, personal telephone and address books, videos, and motor vehicle related documents (titles/registrations).
8. Large amounts of currency (exceeding \$1000.00) or readily transported assets which are used as cash equivalents (cashier's checks, prepaid money/credit cards, money orders, etc.)
9. Items listed in Paragraphs 3 through 7 may be stored in digital media. Therefore, digital media (including but not limited to computers/computer hard drives, digital video recorders (DVRs), floppy disks, CD's, flash/jump drives, personal digital assistants (PDA's), cellular telephones/smartphones, digital cameras, iPODs, iPADs, etc.) are to be seized and examined for the items listed in Paragraphs 3 through 7.

ATTACHMENT C

AFFIDAVIT of  
Special Agent Brian Snedeker  
Drug Enforcement Administration  
Bristol, Virginia

1. I, Special Agent Brian Snedeker, being duly sworn hereby depose and say:
2. The purpose of this application and affidavit is to secure a search warrant for the premises known as 169 Upper Poor Valley Road, Saltville, VA. This affiant, after obtaining and reviewing information, believes there is evidence of distribution of methamphetamine and/or conspiracy to distribute methamphetamine at 169 Upper Poor Valley Road, Saltville, VA in violation of 21 USC 841(a)(1) and 846/841(a)(1).
3. I am a Special Agent with the Drug Enforcement Administration (DEA) and have been so employed for approximately (28) years. During my employment I have received comprehensive classroom training from the Drug Enforcement Administration in specialized narcotic investigative matters including but not limited to drug interdiction, drug detection, money laundering techniques and schemes, smuggling, and the investigation of individuals and organizations involving the smuggling, cultivation, manufacturing, and illicit trafficking of controlled substances and controlled substance precursors. I have participated in the investigations and subsequent arrests of hundreds of individuals involved with the trafficking of methamphetamine (a Schedule II Controlled Substance). I have also executed hundreds of search warrants related to the trafficking and manufacturing of methamphetamine.
4. The facts set forth in this affidavit are known to me as a result of my participation in the investigation of Wendi Cross (aka Wendi Arnold) and information provided to me by other law enforcement officers. Any reference to the gender of any unnamed person within this affidavit does not necessarily reflect the true gender of said person.
5. On 09-04-2018, a 4th Amendment waiver search was performed by law enforcement officers at Robert Griffey's residence (1035 ½ Worthy Blvd, Saltville, VA) in Smyth County, VA. Once officers entered the residence, Robert Griffey and his girlfriend were encountered in the master bedroom and a guest was encountered in the guest bedroom.

A search of Robert Griffey's master bedroom resulted in the seizure of multiple items from his bedside safe including \$15,030 in United States Currency (USC), (3) small Ziploc-type baggies of suspected methamphetamine (a subsequent field test of one of the baggies of suspected methamphetamine returned positive results for methamphetamine), digital scales, numerous new/unused small, Ziploc-type baggies, a baggy of suspected marijuana, and a marijuana "grinder". Also seized from the bedroom were a chunk of crystalline substance (suspected methamphetamine), a glass jar containing suspected marijuana, a money ledger, a spoon with suspected methamphetamine residue, and a loaded syringe. Three (3) baggies of suspected methamphetamine were also seized from the bed in the guest bedroom.

Robert Griffey was Mirandized and agreed to answer questions. Griffey admitted that he sells methamphetamine and initially claimed that he obtained (2) to (3) eight-balls (3.5g = one 8-ball = 1/8 ounce) of methamphetamine at a time from an individual (hereafter referred to as "source of supply") who resides in the Bristol, TN/VA area. Griffey subsequently admitted that he has been obtaining methamphetamine from his source of supply on a weekly basis during the preceding (2) months and actually obtained (2) eight-balls of methamphetamine the first time, (3) ounces of methamphetamine the second time, and (3) to (4) ounces of methamphetamine each week for the remainder of the time. Griffey claimed he paid his source of supply \$800 USC for each ounce of methamphetamine and that he paid his source of supply in cash at the time of delivery (no fronting). Griffey admitted that he sells whole ounces of methamphetamine to some people and smaller quantities to others. Griffey claimed that his methamphetamine customers included Lindsey Soakie (aka Lindsey Jackson) and Wendi Arnold (aka Wendi Cross).

Griffey made the aforementioned statements against his own penal interest.

Griffey was not arrested in relation to the events of 09-04-2018 as Griffey agreed to cooperate with law enforcement. Griffey has not contacted law enforcement since 09-04-2018.

6. During April 2019, law enforcement successfully utilized a confidential source (or sources) to perform multiple controlled purchases (monitored, recorded, and surveilled by law enforcement) of methamphetamine from Robert Griffey in Smyth County, VA.
7. During April 2019, Stephanie Taylor advised law enforcement that she accompanied Lindsey Soakie (Jackson) and Wendi Cross to a residence in Bristol, VA in order to obtain methamphetamine (distribution quantities). Taylor claimed that she, Soakie, and Cross all traveled together in a motor vehicle. Taylor advised that the methamphetamine source of supply sells ounces of methamphetamine at a time.

Taylor made the aforementioned statements against her own penal interest. Taylor is a convicted methamphetamine trafficker. The source of supply described by Taylor is not Robert Griffey, but another source of supply. It is not uncommon for methamphetamine traffickers to have multiple sources of supply.

8. On April 13, 2019, Lindsey Jackson, Wendi Cross, and others were arrested and charged with Possession With Intent to Distribute Methamphetamine during the course of a motor vehicle stop in Washington County, VA. During the stop, multiple items were seized including a multi-gram quantity of suspected methamphetamine (a field test was performed with positive results for methamphetamine), digital scales, hundreds of clear plastic baggies, and several hundred dollars in United States Currency. Jackson and Cross were subsequently released on bond.
9. On May 8, 2019, a search warrant was executed at the residence of Lindsey Jackson in Saltville, VA. Items found in Jackson's residence included a quantity of United States Currency (\$240 in suspected law enforcement supplied "buy" money related to controlled purchases of methamphetamine), a clear plastic bag with suspected

methamphetamine residue, two sets of digital scales, and numerous new/unused, small, Ziploc-type baggies. Jackson was arrested at the scene based upon a warrant issued for a probation violation.

Jackson agreed to answer questions after having been advised of her rights (Miranda). Jackson advised law enforcement that she, Wendi Cross, and others are involved in a multi-ounce conspiracy to obtain methamphetamine and that she, Cross, and others pool their money together in order to buy methamphetamine at a reduced rate of \$600 USC per ounce. Jackson claimed that she has accompanied Cross to a methamphetamine source of supply's residence (not Robert Griffey's – reference ¶7 above) and that Cross was the individual who actually entered the domicile with the USC and returned with the methamphetamine that was subsequently split up amongst those who had invested in the purchase.

Jackson admitted that both she and Cross are methamphetamine traffickers who are involved in methamphetamine trafficking with Robert Griffey and others. Jackson further admitted that Stephanie Taylor (reference ¶7 above) is her biggest methamphetamine customer.

Jackson made the aforementioned statements against her own penal interest.

10. On 06-06-2019, an individual (hereafter referred to as "Person A") was searched by law enforcement in Smyth County, VA pursuant to Person A's 4<sup>th</sup> Amendment waiver. Person A was found to be in possession of approximately (12) ounces of methamphetamine and approximately \$10,000 USC. Person A admitted (against his own penal interest) trafficking in multi-gram to multi-ounce quantities of methamphetamine to various persons and claimed that he recently (within the preceding week or so) distributed (1) ounce of methamphetamine to Wendi Cross (a resident of Smyth County, VA). Law enforcement discovered a contact listing for "Wendi Cross" within Person A's cellular telephone. Law enforcement also observed text messages on Person A's phone to and from "Wendi Cross". The text message exchanges (not all included below) included the following on what is believed (based on Person A's cellular telephone display) to be Thursday, May 30, 2019:

Wendi Cross: "Hey handsome, I'm at pretrial"

Person A Phone: "K stop chilhowie and see me"

Wendi Cross: "...plz bring me some stuff plz" [This affiant believes that "stuff" is a reference to methamphetamine]

Person A: "You gonna meet me at...."

Wendi Cross: "Yes, just let me know when u gonna be there"

Person A: "Omw now" ["Omw" is believed to mean "on my way"]

Wendi Cross: "Everyone out lol" [This affiant believes that Cross is advising Person A that everyone is out of methamphetamine.]

Person A Phone: "Got plenty" [This affiant believes that Person A is advising Wendi Cross that he has plenty of methamphetamine.]



Wendi Cross: "Ok my ride coming this way I'll see u soon"

11. A review of Wendi Cross' criminal history revealed her April 2019 arrest for PWID methamphetamine and other drug related offenses. A review of Robert Griffey's criminal history revealed his state (VA) felony convictions for conspiracy to violate the drug control act, distribution of an imitation controlled substance, distribution of a Schedule I or II Controlled Substance (four counts), and distribution of a Schedule III Controlled Substance (four counts). A review of Lindsey Jackson's criminal history revealed her state misdemeanor conviction for possession of marijuana and her April 2019 arrest for PWID methamphetamine and Possession of a Schedule III Controlled Substance. A review of Stephanie Taylor's criminal history revealed her conviction for distribution of methamphetamine (5 counts).
12. This affiant is aware based on his training, experience, and conversations with other law enforcement officers that individuals who conspire to distribute methamphetamine typically maintain methamphetamine, methamphetamine distribution paraphernalia (small, plastic, Ziploc-type baggies, digital scales, etc.), notes, records, messages, and telephone numbers (pertaining to methamphetamine trafficking related contacts/co-conspirators), and other items as listed and explained on Attachment B (of the Application and Affidavit for Search Warrant to which this affidavit is attached) on their persons, inside their residences, garages, outbuildings/barns, campers, vehicles (or the vehicles they operate), and inside of vehicles registered to other persons when those vehicles are parked at the conspirator's residence/property.
13. Wendi Cross' known residence is 169 Upper Poor Valley Road, Saltville, VA (located within the Western District of Virginia).
14. Based upon the facts set forth above, I believe there is probable cause for the issuance of a search warrant for the premises known as 169 Upper Poor Valley Road, Saltville, VA as there is probable cause to believe that there is evidence of a violation of 21 USC 841(a)(1) and 846/841(a)(1) at said premises.

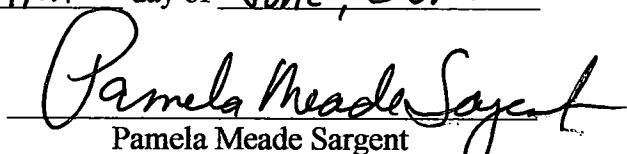


Brian Snedeker, Special Agent (DEA)

6-11-2019

Date

Subscribed and sworn to before me, this the 14th day of June, 2019  
in Abingdon, Virginia.

  
Pamela Meade Sargent  
United States Magistrate Judge  
Western District of Virginia

Seen by:

/s/ Roy F. Evans  
Roy F. Evans, SAUSA

06-11-2019  
Date